

To: Vaughn, Stephanie[Vaughn.Stephanie@epa.gov]
From: Robert Law
Sent: Thur 6/6/2013 7:04:14 PM
Subject: Fwd: RE: RM 10.9, Cap design....

Some additional thoughts on post-dredging sediment sampling; it is the CPG's understanding that Tierra was not required during the Phase 1 removal to collect and analyze sediment samples after dredging and prior to back filling. The Removal Area is well-characterized and we are installing an engineered cap with a active layer. This is a Removal Action and not a final remedy .

R/
Rob

>>> Robert Law 6/4/2013 11:48 AM >>>

1. Thanks
2. Here is the CPG perspective - The vertical tolerance for dredge cuts is +/- 4 inches for a 2 ft cut (the range of the cut would from 20 to 28 inches below surface); the existing characterization data for the 18 to 30 inches below the surface - essentially the same vertical range. We should discuss but the concern is that even if we agree to a minimal number that it will be the subject to scope creep from your Partners.

Thanks

R/
Rob

>>> "Vaughn, Stephanie" <Vaughn.Stephanie@epa.gov> 6/4/2013 8:07 AM >>>

Hi Rob,

1. I sent Dr. Reible's memo to NJDEP and asked them to let me know if their concerns are all addressed, or which ones, if any, remain.
2. If you can show that the existing data addresses this concern in the main removal area, then please do so. Our concern is that the dredging includes the top 2 feet and the coring interval is 1.5 to 2.5. We won't really know what's left at the surface. That said, I think just a handful (on the order of 5 to 10) grab samples in this area should be sufficient as a back-check.

Will keep you posted on NJDEP's response.

Thanks,

Stephanie

From: Robert Law [mailto:rlaw@demaximis.com]
Sent: Monday, June 03, 2013 5:11 PM
To: Vaughn, Stephanie
Subject: Re: RM 10.9, Cap design....

Stephanie:

1. If EPA's concerns about cap design and effectiveness have been addressed are DEP's comments still relevant that you forwarded earlier? Does the CPG need to address them?
2. What additional information would these sediment samples provide that existing coring data does not provide? The samples in the northern extension make sense since the area will not be capped and we will going to native material

>>> "Vaughn, Stephanie" <Vaughn.Stephanie@epa.gov> 6/3/2013 4:39 PM >>>

Hi Rob,

Thank you for sending the memo from Dr. Reible earlier today. CDM reviewed the document and it addressed their concerns. We do have one additional (unrelated) comment on Section 7 of the design. This is in addition to the comments I just forwarded you from NJDEP.

- Please collect surface grab samples of the post-dredge surface prior to capping to document the concentrations of COPCs remaining just under the cap. We can discuss the density of this sampling, but it should include both the original removal area plus the finger (where dredging will occur to native material).

Thanks,

Stephanie